



MURIEL GOODE-TRUFANT  
Acting Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

KAREN K. RIAU  
Labor and Employment Law Division  
phone: (212) 356-2475  
email: krhau@law.nyc.gov

September 4, 2024

*So ordered*  
*9-5-24*  
*Alvin K. Hellerstein*

**BY ECF AND BY FAX**

Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1050  
New York, NY 10007

Re: Huda Ahmad a/k/a Huda Bowman v. The City of New York, et al.  
Docket No. 23 Civ. 04269 (AKH)

Dear Judge Hellerstein:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, attorney for The City of New York and the NYPD (collectively "City Defendants") in the above-referenced action. In accordance with Rule 1. D. of Your Honor's Individual Rules, I write to respectfully request that the case management conference scheduled for Friday, September 6, 2024 be adjourned to Friday, September 27, 2024, or another date convenient for the Court.

*@10 am*  
The parties are continuing settlement discussions. Additionally, Defendant Pagan's disciplinary trial is completed. The adjournment is necessary as the parties are still awaiting the outcome of the New York City Police Commissioner's decision on the recommendation, and, further, to allow settlement discussions to continue in order to facilitate a resolution of this case without the need for continued litigation.

This is City Defendants' third request for an adjournment of the case management conference. The first and second requests were granted. See ECF Dkt. Nos. 42, 44. Plaintiff and Defendant Pagan consent to this adjournment. All parties are available on September 27, 2024 for a case management conference.

In terms of case deadlines, discovery closes on January 31, 2025 and a case management conference is scheduled for February 14, 2025.

Accordingly, City Defendants respectfully request that the Court adjourn the case management conference to September 27, 2024, or another date convenient for the Court.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Karen K. Rhau

Karen K. Rhau

Assistant Corporation Counsel

cc: Via ECF  
John Scola, Esq.  
Law Office of John A. Scola, PLLC  
Attorneys for Plaintiff

Louis C. Lapietra, Esq.  
La Pietra & Krieger, P.C.  
Attorneys for Defendant Pagan